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RICHARD B. STALZER
DIRECTOR, EHS CONSULTING
FERRO CORPORATION

7500 EAST PLEASANT VALLEY ROAD
INDEPENDENCE, OH 44131 U.S.A.
TELEPHONE: (216) 750-7982
FACSIMILE: (216) 750-7908

CERTIFIED MAIL –
RETURN RECEIPT REQUESTED

October 11, 2005

U.S. Environmental Protection Agency
ATTN: Mrs. Mila V. Bensing
Emergency Enforcement and Support Section, SE-5J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mrs. Bensing:

**Re: Request for Information Pursuant to Section 104 of CERCLA for IWI Inc.
Site, Summit, Illinois ("Site")**

This letter is in response to your August 18, 2005 correspondence to Ferro Corporation ("Ferro") requesting information pursuant to Section 104 of CERCLA regarding the Site. Ferro has NOT found any responsive documents regarding the Site.

The information contained in this response is based on a good faith attempt to locate any and all documents related to the Site. This investigation has consisted of an internal records search and discussions with potentially relevant employees. Nothing in this response constitutes an admission of liability of any kind. However, we would like to inform you of the results of our investigation. Listed below are our responses to the Information Request in your August 18, 2005 letter.

1. *Identify all persons consulted in the preparation of the answers to these Information Requests.*

The following relevant Ferro employees were consulted in preparing this response letter: Glen Hopkins (Ferro Plymouth, IN plant manager), Carol Snare (Ferro Plymouth, IN facility services manager), Jim Heim (Ferro Plymouth, IN environmental health and safety manager), and Cindy Whittacker (Ferro Plymouth, IN customer service staff).

2. *Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.*

The following documents and resources were consulted and examined:

- All hazardous and non-hazardous waste shipment manifests available in the plant files
- Waste profile sheets that are developed for wastes shipped off-site
- Ferro's Plymouth, IN computerized customer database that lists all purchasers of plant products since 1995
- Ferro's Environmental Affairs approved waste disposers site list from 1984
- The plant's current approved waste disposers site list

We object to the request for these documents because it is overly broad, irrelevant and burdensome. However, we will provide copies of specific, relevant documents upon request.

3. *If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.*

We have not identified anyone who knows or is familiar with the Site.

4. *List the EPA Identification Numbers of the Respondent.*

The plant's EPA identification number is IND052867595.

5. *Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants, and damages resulting therefrom.*

None have been identified.

6. *Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances by you, your contractors, or by prior owners and/or operators.*

Same as 1. above. To Ferro's knowledge, there were no prior owners or operators of this plant. We believe that Ferro has always been the owner and operator.

7. *Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding questions is anything but an unqualified "no", identify:*
- a) *The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;*
 - b) *Who supplied you with such hazardous substances;*
 - c) *How much hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;*

- d) *When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;*
- e) *Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you; and*
- f) *The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you.*

Yes, however, we object to this request because it is overly broad, irrelevant and burdensome since as stated above, we have not identified any documents linking Ferro with the IWI Site. Ferro's Plymouth, IN site is part of the Liquid Coatings and Dispersions division of the company's Plastics business unit. This plant produces Ultra® and SuperShield® gelcoat for boats, recreational vehicles, truck bodies, sanitaryware, swimming pools, and other polyester and epoxy composite parts and castings; and Cordobond® epoxy repair systems for industrial, marine, utility, and other demanding maintenance applications.

8. *Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.*

We object to this request because it is overly broad, irrelevant and burdensome. Ferro is a publicly held company and information about the company, including past annual reports, can be found on the internet at www.ferro.com.

9. *If Respondent is a Corporation, respond to the following requests:*
- a) *Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.*
 - b) *Provide Respondent's audited financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service. If audited financial statements are not available, please state the reasons that they are not available, and provide the financial statements that management would review at the conclusion of each fiscal year.*
 - c) *Identify all of Respondent's current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.*
 - d) *Provide a list of any investments that the Corporation may own. For example, any ownership in stock should list Corporate name, number of shares owned, and price at a current specific date. Ownership of real estate should itemize property location, type of property (land, office building, factory, etc.), size of property, purchase price, and current market valuation. These schedules should agree with financial statement presentations.*

We object to this request because it is overly broad, irrelevant and burdensome. Ferro is a publicly held company and information about the company, including past annual reports, can be found on the internet at www.ferro.com.

10. *If Respondent is a Partnership, provide copies of the Partnership Agreement.*

Not applicable.

11. *If Respondent is a Trust, provide all relevant agreements and documents to support this claim.*

Not applicable.

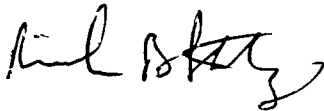
12. *Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of totes, containers, drums, barrels, pails, or waste materials, including hazardous substances, at the Site or to the Site or for transshipment through the Site. In addition, identify the following:*
- a) The persons with whom you or such other persons made such arrangements, including, but not limited to [provide list of transporters];*
 - b) Every date on which such arrangements took place;*
 - c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance may have been stored in totes, containers, drums, barrels, or pails;*
 - d) The owner of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances so accepted or transported;*
 - e) The quantity of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;*
 - f) All tests, analyses, and analytical results concerning the totes, containers, drums, barrels, pails, or waste materials;*
 - g) The person(s) who selected the Site or transshipment of totes, containers, drums, barrels, pails, or waste materials through the Site as the place to which the waste materials or hazardous substances were to be transported;*
 - h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;*
 - i) Where the person identified in g. above intended to have such totes, containers, drums, barrels, pails, hazardous substances, or waste materials transported and all evidence of this intent;*
 - j) Whether the totes, containers, drums, barrels, pails, waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;*
 - k) What was actually done to the totes, containers, drums, barrels, pails, or waste materials or hazardous substances once they were brought to the Site;*
 - l) The final disposition of each of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances involved in such transactions;*

- m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the totes, containers, drums, barrels, pails, or waste material and hazardous substances involved in each transaction;*
- n) The type and number of totes, containers, drums, barrels, or pails in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such totes, containers, drums, barrels, pails, or containers;*
- o) The price paid for transport or disposal or treatment of each tote, container, drum, barrel, pail, waste material and hazardous substance;*
- p) All documents containing information responsive to a)-o) above, or in lieu of identification of all relevant documents, provide copies of all such documents;*
- q) All persons with knowledge, information, or documents responsive to a)-p) above.*

Ferro has not found any responsive documents regarding the Site.

If you have any questions, please don't hesitate to contact me.

Sincerely,



Richard B. Stalzer
Director
Environmental Health and Safety Consulting

cc: G. Hopkins
J. Heim
H. Musler
J. Bays
M. Mazanec-B&H

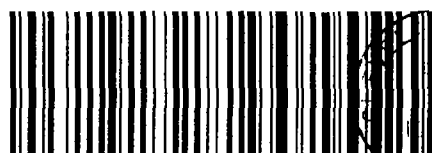
R. Stalzer



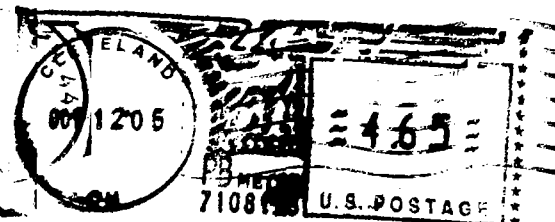
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Ferro Corporation

7500 East Pleasant Valley Road
Independence, Ohio 44131

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OCT 1 - 2005
AGENCY SUPPORT
SECTION

60604-3511

